

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)(KMW)</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

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**PLAINTIFFS’S NOTICE OF FILING OF PROPOSED JURY  
INSTRUCTIONS, VERDICT FORM, AND DAMAGES WORKSHEETS**

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**COMES NOW**, MSP Recovery Claims, Series, LLC (“MSP”), individually and on behalf of TPP Breach of Express Warranty subclass b, TPP Fraud subclass c, and TPP State Consumer Protection Laws subclass a (collectively, “Plaintiffs” or “TPP Classes”), by and through MDL co-lead counsel, TPP class counsel, and trial counsel, who files this Notice submitting herewith the following documents:

**Exhibit A:** Plaintiffs’ Proposed Jury Instructions (with authorities)

**Exhibit B:** Plaintiffs’ Proposed Jury Instructions (clean)

**Exhibit C:** Plaintiffs’ Proposed Verdict Form

**Exhibit D:** Plaintiffs' Proposed Compensatory Damages Worksheets (D-1 through D-3 for ZHP, Teva, and Torrent, respectively)

**Exhibit E:** Plaintiffs' Proposed Punitive Damages Worksheets (E-1 through E-3 for ZHP, Teva, and Torrent, respectively)

Dated: March 14, 2024

Respectfully submitted,

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*MDL Co-lead Counsel, TPP Class Counsel, and Trial Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 14, 2024, a true and correct redacted copy of the foregoing was filed and served via the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Adam Slater

Adam Slater